



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

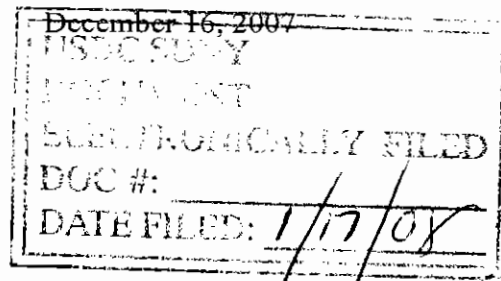
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Corporation Counsel

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Senior Counsel  
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*ENDORSED ORDER*  
*Application granted*  
*John H. Graziadei*  
*1/17/08*

**VIA FACSIMILE**

Honorable Michael H. Dolinger  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007



Re: *Zhao v. City of New York, et al.*, 07 CV 3636 (LAK) (MHD)

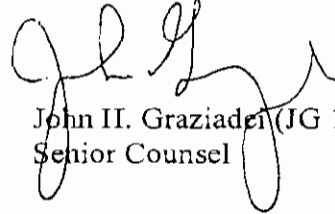
Your Honor:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for defendants in the above-referenced litigation. I write to respectfully request a one-day enlargement of the time permitted by Your Honor's January 10, 2008 Order to respond to plaintiff's January 9, 2008 letter concerning discovery until January 17, 2008 and a two-day enlargement to serve responses and objections to plaintiff's Fourth Set of Interrogatories and Requests for Documents until January 18, 2008. Defendants sincerely regret that this application is necessary but, given the voluminous nature of plaintiff's assertions which span eighteen single-space pages, which is the equivalent of a thirty-six page brief, defendants require this brief enlargement of time to respond fully and carefully to all of plaintiff's assertions. Moreover, responding to plaintiff's letter application has taken more time than anticipated because plaintiff raises issues that plaintiff's counsel had never before raised with defendants and about which defendants had no prior knowledge given that plaintiff's counsel failed to confer with defendants or to request a pre-motion conference as required by Local Civil Rule 37.2 and Your Honor's Individual Rules. Responding to plaintiff's January 9, 2008 letter has also impacted the time necessary to serve formal responses to plaintiff's Fourth Set of Discovery Requests which would be due today as well.

Defendants therefore respectfully request a one-day enlargement of time permitted by Your Honor's January 10, 2008 Order to respond to plaintiff's January 9, 2008 letter concerning discovery until January 17, 2008 and a two-day enlargement to serve responses and objections to

plaintiff's Fourth Set of Interrogatories and Requests for Documents until January 18, 2008.  
Thank you for Your Honor's consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "JH Graziadei", written over the printed name and title.

John H. Graziadei (JG 1333)  
Senior Counsel

cc: Jonathan Sims, Esq.  
Eric Siegle, Esq.